

**From:** "Whitney Rearick"  
**To:** <smcconnell@waterboards.ca.gov>  
**CC:** <alerts@snowlands.org>, "Mark Menlove" <mmanlove@winterwildlands.org>  
**Date:** 3/30/2009 3:37 PM  
**Subject:** Comment on Cleanup and Abatement Order regarding Rubicon Trail impacts

Pamela Creedon

Executive Officer

Central Valley Regional Water Quality Control Board

11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

Dear Ms. Creedon:

Winter Wildlands Alliance is pleased to hear that the Central Valley Regional Water Quality Control Board is holding El Dorado County accountable for the mitigation of environmental degradation along the Rubicon Trail. We support the issuance of a strong final Cleanup and Abatement Order to address environmental impacts of extensive motorized use of the trail.

Winter Wildlands Alliance is a national network of 32 grassroots groups representing more than 25,000 individual members who seek to protect winter wildlands and a quality human-powered snowsports experience on public lands. Our members include Snowlands Network, Friends of Hope Valley, Mammoth Nordic and area residents that use the Eldorado National Forest to ski, snowshoe and otherwise enjoy the quiet solitude that nonmotorized winter forest recreation provides. We are writing to express our support for the draft Cleanup and Abatement Order issued on January 23, 2009 by the Central Valley Regional Water Quality Control Board (CVRWQCB) to the Eldorado County Department of Transportation.

As the CVRWQCB has documented, wet-season use by 4x4s on the Rubicon Trail has a dramatic and lasting effect on the trail, watershed, lakes and streams. We urge the CVRWQCB to include in its Cleanup and Abatement Order the restriction of motorized use of trails during the wet season. During the dry season, restricting trail use to street-legal vehicles will go a long way to improving trail condition.

In addition to environmental impacts, Winter Wildlands is particularly concerned that, without regulation, winter use of the Rubicon Trail by 4x4s will continue to expand and lead to social conflict with nonmotorized users. A 2007 National Forest Service survey found that only 2% of visitors to the Eldorado National Forest participate in off-highway vehicular activity ( <[http://www.fs.fed.us/recreation/programs/nvum/reports/2007/Eldorado\\_Round12.htm](http://www.fs.fed.us/recreation/programs/nvum/reports/2007/Eldorado_Round12.htm)> [http://www.fs.fed.us/recreation/programs/nvum/reports/2007/Eldorado\\_Round12.htm](http://www.fs.fed.us/recreation/programs/nvum/reports/2007/Eldorado_Round12.htm), Table 13). We find that the impact of 4x4s in the forest is vastly disproportionate to the number of people participating in the activity. In contrast, the Forest Service estimates that 55% of visitors to Eldorado National Forest ski, snowboard or snowshoe.

Given the economic uncertainty most government entities in California are facing, we understand the County's reluctance to commit to pay for

improvements and planning. To pay for associated environmental protection, restoration and planning, users of the Rubicon Trail should be charged a permit fee and be subject to quotas limiting use.

Again, thank you for requiring the El Dorado County Department of Transportation to address these critical environmental and social impacts of unregulated use of the Rubicon Trail.

Sincerely,

Whitney Rearick

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Whitney Rearick

Sarah Michael Fellow/Advocacy Director

Winter Wildlands Alliance